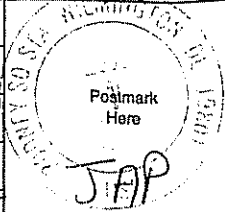


EXHIBIT A

CERTIFIED MAIL™ RECEIPT
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Sent To: Am Sulton
Street, Apt. No.,
or PO Box No. PO BOX 2763
City, State, ZIP+4 Olympia WA 98507

PS Form 3800, June 2002 See Reverse for Instructions

November 4, 2005

Post Office Box 2763
Olympia, WA 98507

Re: Estate of Harry Smith, III, et al. v. Wilmington Police Department, et al.,
C.A. No. 04-1254

Dear Ms. Sulton:

Please find enclosed documents Bates stamped W00500 to W002002. Also enclosed are videotapes of the (1) hospital and Washington Streets; (2) interviews of Officers of Ciritella, Kurten, Dempsey, Saunders and Whitehead; and (3) interview of William Stephenson.

There are videotapes of the 5th and Harrison Street area and an interview of Harry Smith, Jr. Unfortunately, the tapes sent to me, which are copies of the police originals, do not work. I have asked the Wilmington Police Department to make a second copy of these tapes. Once I receive them I will forward copies to you. In addition there are micro-cassette audio tape copies of witness interviews. They are being copied onto standard tapes and should be available next Tuesday. Finally, there are roughly 1,000 papers or so of manuals and reports. They will be sent to you on Monday.

Very truly yours,

John A. Parkins, Jr.

JAP:III
Enclosures

EXHIBIT B

RICHARDS, LAYTON & FINGER

A PROFESSIONAL ASSOCIATION
ONE RODNEY SQUARE
920 NORTH KING STREET
WILMINGTON, DELAWARE 19801
(302) 651-7700
FAX (302) 651-7701
WWW.RLF.COM

DIRECT DIAL NUMBER
302-651-7733
LOVELESS@RLF.COM

LINDA L. LOVELESS

December 9, 2005

VIA EXPRESS MAIL

Anne T. Sulton, Esquire
Post Office Box 2763
Olympia, WA 98507

Re: Estate of Harry Smith, III, et al. v. Wilmington Police Department, et al.,
C.A. No. 04-1254

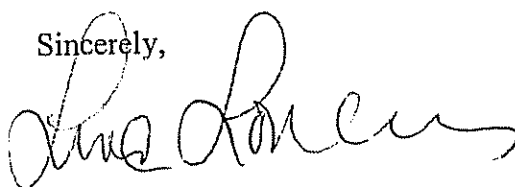
Dear Ms. Sulton:

Please find enclosed two CD's that contain the following interviews from November 9, 2005:

1. Disc 1 contains: Whitehead; Saunders, Kurten; Smith and Ciritella; and
2. Disc 2 contains: Dempsey and the Radio Room.

Please do not hesitate to call with questions or concerns.

Sincerely,



Linda L. Loveless,
Legal Secretary to John A. Parkins, Jr.

Enclosure

EXHIBIT C

RICHARDS, LAYTON & FINGER

A PROFESSIONAL ASSOCIATION

ONE RODNEY SQUARE

920 NORTH KING STREET

WILMINGTON, DELAWARE 19801

(302) 651-7700

FAX: (302) 651-7701

WWW.RLF.COM

LINDA L. LOVELESS
LEGAL SECRETARY

DIRECT DIAL NUMBER
302-651-7733
LOVELESS@RLF.COM

December 22, 2005

Anne T. Sulton, Esquire
Post Office Box 2763
Olympia, WA 98507

Re: Estate of Harry Smith, III, et al. v. Wilmington Police Department, et al.,
C.A. No. 04-1254

Dear Ms. Sulton:

Enclosed please find two CD's containing a total of 119 pictures. Please do not hesitate to call with questions or concerns.

Very truly yours,



Linda L. Loveless

Legal Secretary to John A. Parkins, Jr.

:lll
Enclosures

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ESTATE OF HARRY SMITH, III,)	
HARRY SMITH, JR., and ROSLYN)	
WOODARD SMITH,)	
)	
Plaintiffs,)	
)	Civil Action
v.)	No. 04-1254
)	(GMS)
WILMINGTON POLICE DEPARTMENT,)	
MICHAEL SZCZERBA and ONE OR)	
MORE JOHN DOES,)	
)	
Defendants.)	

Deposition of JOHN F. CIRITELLA taken pursuant to notice at the law offices of Richards, Layton & Finger, One Rodney Square, Third Floor, Wilmington, Delaware, beginning at 10:00 a.m. on Monday, May 8, 2006, before Kathleen White Palmer, Registered Professional Reporter and Notary Public.

APPEARANCES:

ANNE T. SULTON, PH.D., ESQUIRE
P.O. Box 2763
Olympia, Washington 98507
for the Plaintiffs

JOHN A. PARKINS, JR., ESQUIRE
K. TYLER O'CONNELL, ESQUIRE
RICHARDS, LAYTON & FINGER
One Rodney Square - Third Floor
Wilmington, Delaware 19899
for the Defendants Wilmington Police
Department and Michael Szczerba

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EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ESTATE OF HARRY SMITH, III,)
HARRY SMITH, JR., and ROSLYN)
WOODARD SMITH,)
)
 Plaintiffs,)
)
 v.)
)
)
WILMINGTON POLICE DEPARTMENT,)
MICHAEL SZCZERBA and ONE OR)
MORE JOHN DOES,)
)
)
 Defendants.)

Civil Action
No. 04-1254
(GMS)

Deposition of THOMAS CLIFTON DEMPSEY taken pursuant to notice at the law offices of Richards, Layton & Finger, One Rodney Square, Third Floor, Wilmington, Delaware, beginning at 10:00 a.m. on Tuesday, May 9, 2006, before Kathleen White Palmer, Registered Professional Reporter and Notary Public.

APPEARANCES:

ANNE T. SULTON, PH.D., ESQUIRE
P.O. Box 2763
Olympia, Washington 98507
for the Plaintiffs

JOHN A. PARKINS, JR., ESQUIRE
K. TYLER O'CONNELL, ESQUIRE
RICHARDS, LAYTON & FINGER
One Rodney Square - Third Floor
Wilmington, Delaware 19899
for the Defendants Wilmington Police
Department and Michael Szczerba

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1 Q. I'm going to get to experience. That's coming.
2 Okay? I'm focusing right now just on training because
3 I think I need to --

4 A. And what I said before --

5 MR. PARKINS: There's no question pending.

6 Q. I think I need to amend the lawsuit because I
7 don't think you guys are properly trained, so I'm
8 trying to be able to train you. Okay? I'm going to
9 get to experience and I'm going to get to
10 September 13, 2003.

11 MR. PARKINS: Well, Counselor, before you
12 begin your questioning, since you --

13 Q. And I --

14 MR. PARKINS: Counselor, since you
15 suggested you think you have to amend the lawsuit, you
16 can certainly make whatever application you feel is
17 appropriate to the Court. But I don't want to be
18 understood as acquiescing.

19 MS. SULTON: Oh, no, sir. No, sir. I
20 assume you would vigorously oppose it. But I'm trying
21 to determine if I have a training issue here. Based
22 on what I heard yesterday, I do. So I'm simply -- and
23 I'm not trying to be difficult. I'm simply just
24 trying to focus our questions. If we do that, I think



EXHIBIT F

Parkins, John

From: annesulton@comcast.net
Sent: Tuesday, May 16, 2006 10:31 PM
To: Parkins, John
Cc: kesterih@aol.com
Subject: RE: depo

yes, i still plan to file the motions. i have been busy with other pending matters. the various motions will be filed before the end of this week.

----- Original message -----

From: "Parkins, John" <parkins@RLF.com>

I will get you some dates shortly. You stated that you were going to file a motion for leave to amend and a motion to modify the scheduling order. You also wrote that "on Tuesday" you would be filing a motion to preclude the deposition of Kim Jenkins. I haven't received any of those motions yet. Do you still plan to go forward with any of them? If so, when will you be filing them?

Richards, Layton and Finger, P.A. is not providing any advice with respect to any federal tax issue in connection with this matter.

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From: annesulton@comcast.net [mailto:annesulton@comcast.net]
Sent: Tuesday, May 16, 2006 6:00 PM
To: Parkins, John
Cc: kesterih@aol.com
Subject: depo

john:

when can i take the deposition of the fourth police officer shooting harry smith?

anne

EXHIBIT G

Parkins, John

From: annesulton@comcast.net
Sent: Thursday, May 25, 2006 11:28 AM
To: Parkins, John
Cc: kesterih@aol.com
Subject: Re: Smith--scheduling

when can i take the deposition of the 4th police officer?

i am filing a motion to extend expert reports for 30 days and fact discovery until june 9th, with all other dates remaining the same.

i am not filing a motion to amend the complaint.

----- Original message -----

From: "Parkins, John" <parkins@RLF.com>

At the end of the deposition today you mentioned that you would be seeking an extension of certain interim deadlines. In the ensuing discussion I told you that I was inclined to agree to your request for an additional 45 days of discovery and expert witnesses but that I wanted to think about it. I have now had a chance to review my calendar and reflect on the matter.

I now believe that it is impractical to extend fact discovery for 45 days. As you are aware, the deadline for filing dispositive motions is June 14. That deadline cannot be moved because the court needs the time to review and rule on any dispositive motions prior to trial. It is impractical to file dispositive motions while fact discovery is on-going. Thus, it is important that fact discovery be concluded before such motions are due. I am willing to agree, however, to an extension until June 9 for fact discovery.

You also requested an extension on expert discovery. Our motion for summary judgment will not be predicated on expert testimony (or the lack thereof) so it is not quite as critical to have expert reports by the dispositive motion deadline. However, the 45 days you requested is not workable because that would mean that expert discovery would still be ongoing at the time the pretrial order and motions in limine were due. However, pushing things back only 30 days would mean that expert discovery could still be completed by those due dates. Thus, if you want to push the deadlines back no more than 30 days, that is fine with me; if not, that's OK too.

Tomorrow I will be sending you notices of depositions for the latter part of May. I do not wish to inconvenience you, but unless and until the court enters an order modifying the schedule I need to comply with the May 31 deadline. For planning purposes, I will likely be taking the deposition of your clients, the medical examiner, Mrs. Gwyn, Mr. Maldonado, Mr. Rivera.

Richards, Layton and Finger, P.A. is not providing any advice with respect to any federal tax issue in connection with this matter.

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6/14/2006